

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of )  
 )  
The Southern New England )  
Telephone Company )  
 )  
Implementation of the )  
Pay Telephone Reclassification )  
and Compensation Provisions )  
of the Telecommunications )  
Act of 1996 )

CC Docket No. 96-128

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**PETITION FOR EXPEDITED WAIVER**

The Southern New England Telephone ("SNET") respectfully requests an expedited waiver, pursuant to the Federal Communications Commission's ("Commission's") Rules,<sup>1</sup> of the requirement to provide payphone lines that will be capable of passing payphone-specific coding digits by December 31, 1998, for 100% of payphone service provider ("PSP") lines using the switch-based Flexible Automatic Number Identification ("Flex ANI") information digits capability. SNET seeks this expedited waiver due to three specific problems affecting a small percentage of payphones within SNET's serving area: 1) tandem screening for toll-free numbers ("tandem screening"); 2) toll-free numbers translated to POTs numbers ("800 to POTs"); and finally, 3) SNET's scheduled modernization for two of its central offices scheduled for upgrade to digital technology. SNET seeks a waiver until May 1999 for its tandem screening, 800 to POTs, and the Stratford and Milford 1AESS central offices' completion of modernization.

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<sup>1</sup> 47 C.F.R. § 1.3.

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SNET has aggressively worked with its switch vendors, Lucent and Nortel, for solutions to a number of complex problems associated with its Flex ANI installation. SNET has been completely reliant on the progress of the vendors' development of solutions to many of SNET's and the industry problems in order to meet the compliance date of December 31, 1998. SNET has been informed by Lucent that solutions for the tandem screening and 800 to POTs problem will be available by the end of March 1999. Nortel will have the tandem-screening feature by December 31, 1998 and SNET is hopeful that Nortel will commit to having the 800 to POTs feature available by end of March 1999. SNET estimates that it will take approximately two months from the date the features are available to implement them in SNET's five access tandems.

In addition, to avoid significant expenditures on required generic upgrades and end office features, SNET seeks to defer Flex ANI implementation for two of its 1AESS and two of its DMS100 end offices until the end of May when the Lucent tandem screening feature will be implemented.

## **L BACKGROUND**

On March 9, 1998, the Commission issued an Order<sup>2</sup> designating automatic number information indicators ("ANI ii") and Flex ANI as the methods to provide payphone-specific coding digits that comply with the requirements of the Commission's Orders. The Commission's Order also granted a number of waivers to allow local exchange carriers ("LECs"), including SNET, until September 30, 1998, to provide Flex ANI for 75% of the smart payphones in its service area and until December 31, 1998 to provide Flex ANI for 100% of them. Further, the Commission allowed SNET an extension of the September 30, 1998, compliance date until October 31, 1998, due to a

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<sup>2</sup> Memorandum Opinion and Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, DA 98-481, released March 9, 1998.

union work stoppage in Connecticut that completely halted the implementation work for Flex ANI.<sup>3</sup>

To comply with the Commission's Order, SNET began installing Flex ANI in its end offices beginning in the first quarter of 1998. Upon testing the feature earlier this year, SNET discovered that both Lucent and Nortel, the manufacturers of SNET's switches, designed their Flex ANI features based on the Service Switching Point ("SSP") function being performed at the end office. SNET's toll free architecture is unique in that the SSP functionality is provided at the access tandem level and it utilizes a combination of Intelligent Network 1 ("IN 1") and Advanced Intelligent Network ("AIN") functionality for 800, 888 and 877 services depending on the switch vendor. When the SSP IN 1 function is performed at the tandem level, the access tandems cannot provide post-query screening to determine if Flex ANI should be delivered to a specific carrier. SNET negotiated with its switch vendors to develop a tandem enhancement to resolve this problem. Both vendors planned to develop and provide the tandem enhancement with the 800 to POTs feature. Nortel advised SNET that it could provide its tandem enhancement and 800 to POTs feature by December 31, 1998. Recently it was discovered that the 800 to POTs feature could not provide carrier screening. Nortel is in the process of adding this capability and it will be available in the first quarter of 1999. Nortel's tandem enhancement will be available by December 31, 1998. Lucent could not provide either the tandem enhancement or the 800 to POTs features until the end of the first quarter of 1999.

To meet the Commission's requirements, earlier this spring and summer, SNET attempted to negotiate a lease arrangement with Nortel and Lucent to provide SSP IN 800

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<sup>3</sup> Memorandum Opinion and Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Southern New England Telephone SNET Request to Extend Limited Waiver of Coding Digit Requirement, CC Docket No. 96-128, DA 98-1973, released October 1, 1998.

functionality in the Nortel and Lucent end offices until the tandem enhancement could be developed and installed. SNET was able to negotiate a lease arrangement with Lucent, but not with Nortel. This did not appear to be a significant problem at the time, because the Lucent lease would enable SNET to meet the Flex ANI October compliance mandate and the availability of Nortel's tandem enhancement by year-end 1998 would enable SNET to provide Flex ANI to 99% of its payphones. Only two Nortel end offices (Wilton and New Canaan), which "home off" of a Lucent tandem would not be Flex-ANI capable until the Lucent tandem enhancement was implemented. To purchase the end office features for these two offices would be costly and only of value for a few months.

Significant additional translations and testing were required to deploy functionality to Lucent offices. This work began in August, immediately following the completion of leasing arrangements with the vendor. However, work efforts were delayed due to the union work stoppage in Connecticut and the need for SNET to complete a significant work effort to implement feature group D carrier identification code ("FGD CIC") expansion. Work resumed after the work stoppage to meet the Commission's required date of October 31, 1998, but further testing of the Flex ANI capabilities uncovered additional problems.

First, it was determined that Flex ANI was not operational for 888 and 877 calls made from Lucent end offices because SNET utilizes AIN versus IN 1 for 888 and 877 services. End office AIN did not provide post-query screening capability. This problem affected an estimated 8-10% of payphone calls made from Lucent end offices or approximately 4% to 5% of all payphone calls. SNET made arrangements with Lucent to lease the IN 888 and 877 feature in all of its Lucent end offices not served by the Hartford Nortel tandem. The requirement to provide SSP 800, 888 and 877 functionality in SNET's end offices created a 1AESS problem. The end office SSP functionality requires the 1AESS to be on Generic 13, which was being deployed to meet the Commission's requirements for Local Number Portability ("LNP") and would not be available in six

1AESS offices in 1998. Four of the 1AESS switches were planned for Generic 13 for the first quarter of 1999. SNET has worked with Lucent to accelerate the installation of Generic 13 in four 1AESS offices into 1998 and these updates are currently in progress. Two 1AESS offices, however, were not planned for Generic 13 as they will be upgraded to digital offices in July and September of 1999.

By the end of December 1998, with the installation of the Nortel tandem screening feature and with the advancement of four 1AESS generic upgrades, over 90% of SNET smart payphone lines should be Flex ANI capable.

The offices which will not be Flex ANI capable by December 31, 1998 and for which SNET now requests an expedited waiver are as follows:

Office	% of "Smart" Payphones	Flex ANI Availability Date	Flex ANI Requirement
New Canaan	.6% *(.05%)	5/31/99	Lucent tandem screening feature
Wilton	.4% *(.03%)	5/31/99	Lucent tandem screening feature
Stratford	3.0% *(.24%)	5/31/99	Lucent tandem Screening feature
Milford	3.9% *(.32%)	5/31/99	Lucent tandem Screening feature
Total	7.9% *(.63%)		

\* SNET "smart" payphones represent 8% of the total payphones in its service area. Thus, less than 1% or .63% of SNET's payphone lines are affected by the Flex ANI limitations in these four offices.

In addition, SNET has a problem that affects a small number of toll-free number (800, 888 and 877) calls that are translated to POTS numbers for billing purposes. In order to provide the Flex ANI digits on toll-free numbers, vendor software enhancements are required to perform the necessary translations. Switches at the end office and access

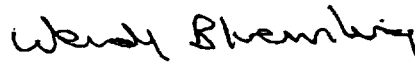
tandems that perform SSP functionality do not have the capability to transmit the Flex ANI digits on toll-free number (800, 888 and 877) calls that are routed to POTS numbers. This function requires the end office or access tandem to perform a query of the 800 database to identify either a POTS number or a CIC. If a POTS number is located, the SSP functionality replaces the Flex ANI digits with the standard code of "24" which identifies the call as a toll-free number. Thus, the interexchange carrier ("IC") receiving this information is aware that the call is to a toll-free number, but not that the call originated from a payphone. SNET estimates that this problem affects less than 1/2% of payphone calls. Both of SNET's vendors have informed SNET that a remedy for this problem will not be available until the first quarter of 1999. SNET expects to have the 800 to POTS feature installed by May 31, 1999.

## **II. CONCLUSION**

SNET has aggressively worked with its switch vendors for solutions to a number of complex problems associated with Flex ANI deployment. SNET has relied on its vendors' progress toward development of solutions to maintain SNET's unique cost effective toll-free architecture. Therefore, SNET respectfully must seek a waiver from the Commission of the payphone coding requirements until May 1999 for its Wilton, New Canaan, Stratford and Milford central offices and to provide 800 to POTS requirements.

Respectfully submitted,

THE SOUTHERN NEW ENGLAND  
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December 9, 1998

**CERTIFICATE OF SERVICE**

I, Barbara C. Majeski, hereby certify that SNET's Petition for Expedited Waiver has been filed this ninth day of December 1998, to all parties listed below.

  
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